

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

CIVIL ACTION NO. 3:23-CV-00667

JANE DOE

Plaintiff,

v.

FARD SULTAN

Defendant.

**JOINT MOTION FOR LIMITED
EXTENSION OF
MEDIATION DEADLINE**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and Local Civil Rules 7.1 and 16.3, Plaintiff Jane Doe (“Plaintiff”) and Defendant Fard Sultan (“Defendant”) hereby jointly request a two-week extension of the deadline to complete mediation in this matter, through and including August 6, 2024. In support of this motion, Plaintiff and Defendant jointly show the following:

1. Pursuant to the Case Management Order entered in this matter (ECF No. 15), the deadline for the parties to complete mediation is August 23, 2024.
2. The parties recently began discussing possible paths to resolution of this matter, including the submission of a joint motion for entry of a consent judgment.
3. The parties have made substantial progress in this regard and expect to submit, in the very near future, a joint proposal to the Court that, if acceptable to the Court, would conclude this matter.
4. The parties believe their energy and resources are best directed, at this point, to finalizing the details of the resolution they have been discussing. Accordingly, the parties

request a two-week extension of the mediation deadline in this matter, to and including August 6, 2024, so that they may focus their efforts on resolving this matter without the immediate time burden and cost of mediation.

5. The mediation deadline that is subject to this motion has not yet passed.

6. Counsel for Plaintiff and Defendant spoke by telephone on Saturday, July 20, 2024, during which they discussed the need for this motion and reached agreement for it to be submitted as a joint filing. Because Defendant is proceeding pro bono and is not a registered ECF e-filer, this joint motion is submitted by the undersigned on behalf of both parties.

WHEREFORE, for the foregoing reasons, the parties jointly request a two-week extension of the mediation deadline in this matter, to and including August 6, 2024.

This the 22nd day of July, 2024.

/s/ L. Cooper Harrell

L. Cooper Harrell
N.C. State Bar No. 27875
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document has been served by first class mail as follows:

Fard Sultan
801 S. Main Street, Apt. #220
Mount Holly, NC 28210

This the 22nd day of July, 2024.

/s/ L. Cooper Harrell

L. Cooper Harrell